

CLERK, U.S. DISTRICT COURT MINNEAPOLIS, MINNESOTA

EXHIBIT A

Arbitration response for UHG First Set of Requests for Production - 2019-06-17



Question 1:

- 1. When search UHG jobs online, you should find there are minimum two years' work experiences in order to be qualified for applying for a junior java developer jobs, some teams might require applicants with 10 year work experiences for software engineer job (not a senior software engineer job). However, a young college graduate would be already a senior java developer. It is very common to require an applicant to have 5+ years experiences in order to qualify for applying.
 - https://www.dice.com/jobs?q=UHG+java+developer&dc=UnitedHealth+Group
- 2. Almost of all TDP associate would get to senior position when they join UGH from school for two years.

Question 2, 3, 4, 5

3. Most of documents you might already have. I will bring some additional copies with highlight key points

Question 6

- 4. In attached documents:
 - a. 1st attorney payment \$150 (the paycheck copy is in my old phone. It is difficult to get it now)
 - b. 2nd attorney contract (once I could get reward)
 - c. Discount UHG employee stock purchase, already paid, but got withdrawn by UHG
 - d. Lost PTO benefit (about 11 days)
 - e. No job for two months
 - f. Emotional distress (wanted to see doctors, but afraid of hearing bad things from psychologist and causing family members' affright, so fear avoidance visiting doctors)
 - g. Court expends
 - h. Future no employment gap
 - i. Losses in my kid's education
 - j. Cost in seeking for legal helps (commute cost and took time off normal work hours)

Question 7

Can you forward all UHG request documents to me, include Exhibits

Question 8

5. Should and wanted to see doctors, but afraid of lost job and wasting money, so fear to see doctors

Question 9

6. Over the required needing

Question 10

Provided job-hunting email records

Question 11

Will provide my written meeting minutes.

Question 12

Over request on private financial records. Only provide the document for showing no job period in the time it must be needed

Question 13

Will forward some emails I think you might not have

Question 14

That can be found from the emails be the emails between me and managers. Also manager can change them at any time.

Question 15

My phone did not receive UHG request for documents. Does your phone receive such request?

Question 16

Will provide you my meeting minutes

Question 17

Will provide you my meeting minutes. Also, the more support documents can be found in Sujata's team work requirement/task management website: basecamp.com and their backup files

Question 18

You should have my comments on "Corrective Action Plan". In the initial "Corrective Action Plan", I refuted all of Sujatha provided examples and argued with Sujatha about her comments. I added my disagreement comment on "Corrective Action Plan", but due to limited, most of my comments could not be written into "Corrective Action Plan". I asked Sujatha what I should do, Sujatha said I should wait until HR saw my comments, then HR would talk to me, then I had chance to provide more comments. But until I got fired, no HR people asked me anything about my comments.

In my final "Corrective Action Plan", I had argued with Sujatha about her comments. She said I should not argue with her because she would not accept whatever I said. She told me what I only could do is to accept them, but nothing else.

I asked Sujatha to write some examples or more details facts, but Sujatha did not do so. Without detail facts and examples, I didn't know how to refute too general comments. However, while I was waiting for Sujatha's more detail facts and examples, I got fired and lost the opportunities to add my comments on final "Corrective Action Plan".

Question 19

After Sujatha reviewed the final "Corrective Action Plan" with me, Sujatha told me I had to do whatever she asked me to do, otherwise I would be fired. The examples can be found in my claim documents.

Question 20

In my phone meeting with David and follow-up emails communicated with UHG HR, I told David via UHGHR that Sujatha's examples on "Corrective Action Plan" are untrue and misleading. I provided the details about why I disagreed the examples provided by Sujatha. On the phone meeting, I already mentioned my refuting statements can be verified in UHG internal system, like service-now, and basecamp.com website which is Sujatha used to manage the work requirement and tasks. In my emails to UHG HR, I had asked them to tell David that if there are anything not clear or not sure, please contact me. But David did not contact me, and just used Sujatha's comments to support Sujatha's statements are no false.

David, as an experienced investigator, should know it is not a correct behavior or conduct to prove a statement by that statement itself. This just like said "why you're wrong because you are wrong".

Question 21:

I have refuted Sujatha's false and misleading comments on the "Corrective Action Plan" for many times and in many ways (like in dispute letter, emails with UHG HR, EEOC, MNHR, etc.), but UHG did not respond my refuting arguments. Instead, UHG just repeated the Sujatha's comments that I had refuted, and used them as the major facts as the reasons to terminate my job

Question 22:

I have refuted Sujatha's false and misleading comments on the "Corrective Action Plan" for many times and in many ways (like in dispute letter, emails with UHG HR, EEOC, MNHR, court, etc.), but UHG did not respond or question my refuting arguments. Instead, UHG just repeated the Sujatha's comments that I had refuted and treat them as facts.

Question 23:

The damage and lost can be categorized into two parts: before tax and after tax

Before tax lost:

1. No job for about two months

- 2. Lost my Pay-time-off benefit for about 11 dates (8 hours per date)
- 3. Lost the earning from my half-year employee-stock-purchase benefit (UHG withdrawn my money from my Fidelity year employee-stock-purchase account. I purchased the max allowed of my income to purchase UHG employee discount stock. At the time of my money got withdrawn, UHG stock was going up, comparing with the mid-year stock price)
- 4. Attorney fees
- 5. Future unemployment lost (due to the bad employment records created by UHG and my employment lawsuit records, my future job hunting would be more difficult. Employment history check become more and more strict and rigorous. The references and the reasons for leaving of the last three employers are most basic consideration by almost all of recruiters. If my current employer were not so hurry to hire a strong developer, I could not be sure how long I would find a job. Many of my job search ended with no references from my last employer)

After tax lost:

- 1. Due to suddenly job lost and no enough funds to pay my daughter private school tuition, my daughter had to drop out Blake School after our financial aid got denied. Such not only made my daughter have been feeling very sad, but also wasted our money of \$59,000 that we already spent in school for a continuing better education.
- 2. Pre-paid attorney fee
- 3. The cost in looking for legal helps